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March 21, 2024

**Via ECF**

The Honorable Denise L. Cote, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**RE: *Hsuanyeh Law Group PC v. Winston & Strawn LLP et al.*, 1:23-cv-11193-DLC  
(S.D.N.Y.) – Second Request for an Extension of Time to Respond to Complaint and  
Adjournment of Initial Pretrial Conference and Request for Court Intervention to  
Facilitate Settlement Negotiations**

Dear Judge Cote:

The undersigned represent defendants Winston & Strawn LLP, Michael R. Rueckheim, Ya-Chiao Chang, Vivek V. Krishnan, and Evan D. Lewis (“Defendants”) in the above-referenced case. Pursuant to Rule 1(E) of the Court’s Individual Practices in Civil Cases and the Notice of Initial Pretrial Conference (ECF No. 20), Defendants respectfully request a second extension of time to respond to Plaintiff’s Complaint (ECF No. 1) and a second adjournment of the Initial Pretrial Conference to a date following Defendants’ response.

Defendants do not make this request lightly, as they fully recognize that the Court clearly ordered that “[t]here shall be no further extension.” Dkt. 24. However, the parties have been engaged in settlement negotiations for the last several weeks and would likely be close to an agreement except for one term demanded by Plaintiff, which Defendants believe that the Court, a magistrate judge, or a Court-appointed mediator could help the parties work through. Defendants believe that the Court’s assistance would be beneficial in facilitating an early resolution to this dispute. Defendants do not seek this request for additional time to prepare its response to the Complaint or to delay the adjudication of Plaintiff’s Complaint, but only to promote judicial efficiency given the ongoing negotiations and a position being taken by Plaintiff as part of those negotiations. Defendants inquired with Plaintiff whether it would object to an extension to facilitate these settlement efforts, and Plaintiff indicated that it did not object but noted the Court’s order that no further extensions shall be granted. Should the Court be willing to get involved in these efforts, Defendants respectfully request two additional weeks on its time to respond and a corresponding adjournment of the Initial Pretrial Conference.

Defendants’ current deadline to answer or otherwise respond to Plaintiff’s Complaint is March 27, 2024. Dkt. 24. The Initial Pretrial Conference is scheduled for March 29, 2024 at 3:00 p.m. *Id.*

This is Defendants' second request for an extension of time to answer or otherwise respond to the Complaint and second request for an adjournment of the Initial Pretrial Conference. As set forth above, the requested extension and adjournment is for the purpose of requesting the Court's intervention in facilitating ongoing settlement negotiations with the goal of reaching an early resolution of this case to promote judicial efficiency. The requested extension and adjournment will not affect any other currently scheduled dates.

Defendants thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

/s/ Sean R. Anderson

Sean R. Anderson

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cc: All Counsel of Record (via ECF)